## **EXHIBIT A**



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May 26, 2005

VIA FACSIMILE AND MAIL 302-576-3290

Richard A. DiLiberto, Jr. Young Conaway Stargatt & Taylor, LLP The Brandywine Building 1000 West Street, 17th FL Wilmington DE 19801

RE: Echevarria v. U-Haul International, Inc., et al. Case No. 05-284 (GMS)

Dear Rick:

I am writing as a follow-up to the voice mail that I left you on or about May 25, 2005. Also, for some reason I have not yet heard back in response to the two additional phone messages I have left.

In any event, I would like very much to speak with you about your recently filed motion to remand. Specifically, and as I stated in my voice mail message to you, I believe that there is not proper grounds for you maintaining this motion. We did indeed obtain written consent from Nationwide Insurance for the removal. Prior to filing the removal papers, we were in contact with the Court's clerk to determine whether we needed to append the written consent to our removal papers and were told that we did not need to do so. As I further stated in my voice mail, if you need the letter from Nationwide, we would be happy to provide it to you. Moreover, even if you had a factual foundation for the motion (which you do not), it is not supported by any Third Circuit precedent.

In light of these circumstances, I am asking you to withdraw your motion. My client should not have to incur the cost of filing a response to this motion. Our response is due on June 8, 2005. We will hold off on the preparation of our response papers in order to give you time to consider these matters and withdraw the motion. We will wait until Wednesday, June 1, 2005 to begin that process.

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Unfortunately, if you do not withdraw the motion and we are forced to respond, we may also have no choice but to request our costs. I do not really want to make this request and am therefore hopeful that we can cooperate through this and future issues. I look forward to hearing from you favorably.

Sincerely yours,

QUARLES & BRADY LLP

Frank J. C

Francis H. LoCoco

FHL:jlb

cc: Steven L. Caponi, Esq.

bc: Steven Taub, Esq.

bbc: Patrick W. Schmidt

Monica Tynan Lars Gulbrandsen